

1 R. Alexander Pilmer (State Bar No. 166196)
Email: alexander.pilmer@kirkland.com
2 David I. Horowitz (State Bar No. 248414)
Email: david.horowitz@kirkland.com
3 Jay L. Bhimani (State Bar No. 267689)
Email: jay.bhimani@kirkland.com
4 Kristin E. Rose (State Bar No. 278284)
Email: kristin.rose@kirkland.com
5 KIRKLAND & ELLIS LLP
333 South Hope Street
6 Los Angeles, California 90071
Telephone: (213) 680-8400
7 Facsimile: (213) 680-8500

8 Attorneys for Defendants
9 RBS Securities Inc. and RBS Acceptance Inc.

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12 **WESTERN DIVISION**

13 NATIONAL CREDIT UNION
14 ADMINISTRATION BOARD, as
15 Liquidating Agent of Western Corporate
Federal Credit Union,

16 Plaintiff,

17 vs.

18 RBS SECURITIES INC. *et al.*,

19 Defendants.
20
21
22
23
24
25
26
27
28

Case No. CV 11-05887 GW (JEMx)

**APPLICATION TO FILE
DOCUMENTS UNDER SEAL**

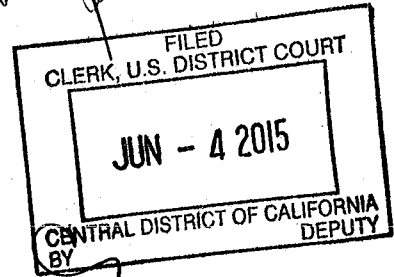
[L.R. 79-5.1]

Judge: George H. Wu
Courtroom: 10

Complaint Filed:
July 18, 2011

First Amended Complaint Filed:
August 19, 2013

Second Amended Complaint Filed:
November 14, 2014



1 Pursuant to Local Rule 79–5.1, Defendants RBS Securities Inc. and RBS
2 Acceptance Inc. (collectively “RBS”) hereby request permission from the Court to file
3 under seal the following documents:

- 4 1. An un-redacted version of RBS’s Letter Motion to Compel Compensation
5 Discovery (the “Letter Motion”), a redacted version of which was attached as
6 Exhibit 1 to the concurrently filed Notice of Filing of RBS’s Letter Motion.
- 7 2. Exhibits A, C and D to RBS’s Letter Motion.

8 The Court has entered a Master Protective Order relating to this action. ECF
9 No. 318. The Master Protective Order states that:

10 In the event that before trial in the Related Actions, or in connection with any
11 hearing in or any matter relating to the Related Actions, counsel for any Party
12 determines to file or submit in writing to the Clerk's office any Protected
13 Material, or any papers containing or making reference to the substance of such
14 material or information, such documents or portions thereof containing or
15 making reference to such material or information shall be filed with a request
that the documents be filed under seal in accordance with the rules of the Court,
and kept under seal until further order of the Court.

16 Plaintiff National Credit Union Administration Board designated Exhibits A
17 (Connie Loveless’ deposition transcript) and C (a document produced by NCUA in
18 this matter) to RBS’s Letter Motion as Confidential under the Master Protective
19 Order. Exhibit D is an email string between counsel for RBS and counsel for
20 Plaintiff, and includes excerpts from Ms. Loveless’ confidential deposition transcript.
21 In accordance with Paragraph 9 of the Master Protective Order, RBS requests that
22 these exhibits be filed under seal in accordance with the rules of the Court, and kept
23 under seal until further order of the Court.

1 DATED: June 4, 2015

Respectfully submitted,

2 KIRKLAND & ELLIS LLP

3 
4 R. Alexander Pilmer
5 David I. Horowitz

6 Attorneys for Defendants RBS Securities Inc.
7 and RBS Acceptance Inc.
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28